

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

In re:

Bam Tech Solutions, Inc.,

Debtor.

Chapter 7

Case No. 23-53167

**THIRD MOTION FOR EXTENSION OF TIME FOR FILING
SCHEDULES AND STATEMENT OF FINANCIAL AFFAIRS**

Bam Tech Solutions, Inc. (the “**Debtor**”) files this Motion for Extension of Time for Filing Schedules and Statement of Financial Affairs (the “**Motion**”) and in support thereof, respectfully represents:

1. Debtor filed its petition for relief under Chapter 11, Title 11, of the United States Code on April 3, 2023 (the “**Petition Date**”).
2. Pursuant to 11 U.S.C. § 521 and Fed. R. Bankr. P. 1007(c), Debtor is obligated to file its Schedules and Statement of Financial Affairs within fourteen days of the Petition Date. The Debtor has filed two previous motions to extend time.
3. The Debtor requests an extension to May 8, 2023 within which to file its Schedules and Statement of Financial Affairs to ensure all information is complete.
4. This is the Debtor’s third request for an extension. The § 341 Meeting of Creditors has been scheduled for May 9, 2023.
5. Debtor is requesting more time to finalize a review of bank statements so as to ensure that its statement of financials affairs is accurate. Debtor’s counsel has been diligently working through recently produced bank statements and needs additional time with Debtor to make sure that

everything is accurate prior to Debtor signing the statement of financial affairs and its schedules under penalty of perjury.

WHEREFORE, the Debtor respectfully requests this Court:

- (a) enter an order, substantially in the form attached hereto as **Exhibit A**;
- (b) grant the requested extension through and including May 8, 2023; and
- (c) grant such other and further relief as the Court deems just and reasonable.

Dated: May 5, 2023

ROUNTREE LEITMAN KLEIN & GEER, LLC

/s/ Will Geer

Will B. Geer, Ga, Bar No. 940943

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Attorneys for Debtor

EXHIBIT “A”

[PROPOSED ORDER]

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

In re:

Bam Tech Solutions, Inc.,

Debtor.

Chapter 7

Case No. 23-53167

**ORDER GRANTING DEBTOR’S MOTION FOR EXTENSION OF TIME
FOR FILING SCHEDULES AND STATEMENT OF FINANCIAL AFFAIRS**

This matter is before the Court upon Debtor’s Motion for Extension of Time for Filing Schedules and Statement of Financial Affairs (the “**Motion**”) [Docket No. __] filed on May 8, 2023. It appears to the Court that a Chapter 11 case was commenced by the filing of a voluntary petition on April 13, 2023, constituting an Order for Relief; that pursuant to 11 U.S.C. § 521 and Federal Rule of Bankruptcy Procedure 1007(c), Debtor is obligated to file its Schedules and Statement of Financial Affairs within fourteen (14) days of the Order for Relief, and that the aforementioned deadline expired on May 1, 2023; that Debtor seeks an extension of time in which to file its

Schedules and Statement of Financial Affairs; that the Section 341 Meeting of Creditors has not passed and for good cause shown, it is hereby

ORDERED AND ADJUDGED as follows:

1. The Motion is **GRANTED**; and
2. The time period within which Debtor must file its schedules and Statement of Financial Affairs is hereby extended through and including May 8, 2023.

END OF DOCUMENT

Prepared and Presented by:

ROUNTREE LEITMAN KLEIN & GEER, LLC

/s/ Will Geer

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Suite 362, Richard B. Russell Building
75 Ted Turner Drive, SW
Atlanta, Georgia 30303

CERTIFICATE OF SERVICE

This is to certify that I have this day caused to be served copy of the foregoing **Third Motion for Extension of Time for Filing Schedules and Statement of Financial Affairs** via by filing same with the court using the CM/ECF system, which will send an electronic mail notification to the parties as indicated below:

S. Gregory Hays
Hays Financial Consulting, LLC
Suite 555
2964 Peachtree Road
Atlanta, GA 30305

Dated: May 5, 2023

ROUNTREE LEITMAN KLEIN & GEER, LLC

/s/ Will Geer

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